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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

Amendment of the Commission's
Rules to Establish New Personal
Communications Services

GEN Docket No. 90-314
ET Docket No. 92-100

REPLY COMMENTS

Pursuant to Section 1.415 of the Commission's Rules, Alcatel Network Systems, Inc. ("ANS"), by its attorneys, hereby replies to comments submitted on the above-captioned Notice of Proposed Rule Making and Tentative Decision ("NPRM").¹ In its NPRM, the Commission proposes allocation of spectrum for personal communications services ("PCS") and adoption of rules governing provision of PCS.

As a leading supplier of fixed microwave equipment,² ANS is concerned about the potential impact that PCS operation could have on 2 GHz fixed microwave operation. While ANS does not wish to address the technical issues raised in the NPRM that strictly concern PCS operation, it herein responds to comments regarding the capability of PCS and fixed microwave users to share the 2 GHz

¹The deadline for filing Reply Comments in this proceeding was extended to January 8, 1993. Order Extending Time for Reply Comments, GEN Docket No. 90-314, ET Docket No. 92-100 (DA 92-1600, released Nov. 24, 1992).

²ANS is a wholly-owned subsidiary of Alcatel Alsthom, one of the world's largest corporations (with annual sales in excess of \$30 billion). Alcatel Alsthom is the world's largest manufacturer and supplier of telecommunications equipment. In particular, Alcatel Alsthom is the world's largest independent manufacturer and supplier of microwave telecommunications equipment.

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band.

In the NPRM, the Commission recognizes the importance of protecting 2 GHz fixed microwave operations from PCS interference when the spectrum is shared.³ Certain PCS proponents claim that such sharing is feasible and that the integrity of fixed microwave service would not be compromised.⁴

ANS disagrees. Under the Commission's proposals in the NPRM, fixed microwave service and PCS cannot cohabitate on the 2 GHz band. If such sharing were to occur, co-channel operation by both services would be degraded significantly. ANS' concern over this issue has been substantiated in its laboratory, where its point-to-point system experienced degradation due to interference from PCS equipment. This measured degradation very nearly matches the calculated degradation, which leads ANS to believe that similar calculations can be made for other radios and other sources of interference.

To clear spectrum for PCS, the Commission has reallocated the 2 GHz band, and it has decided to classify new 2 GHz fixed microwave licensees as secondary and to reclassify existing 2 GHz fixed microwave licensees as secondary after expiration of a yet-to-be determined transition period.⁵ Should it eventually be

³NPRM at para. 109.

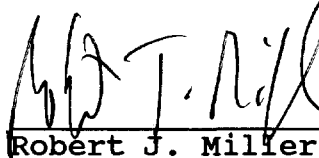
⁴See, e.g., Northern Telecom, Inc. at 35-36; PCN America, Inc. at Appendix I; American Personal Communications at 54-57 and Attachment E.

⁵Redevelopment of Spectrum to Encourage Innovation in the Use of New Telecommunications Technologies, First Report and Order and Third Notice of Proposed Rule Making, 7 FCC Rcd 6886 (1992).

proven with empirical and other documentary evidence that 2 GHz band co-channel PCS and fixed microwave operation indeed is feasible without service deterioration, then the underlying premise for relegating 2 GHz fixed microwave licensees to secondary status no longer exists. Consequently, if sharing is proven viable, new 2 GHz fixed microwave users, which, at a minimum, would be as compatible with PCS operations as current users, should be granted co-primary instead of secondary status. Moreover, the need to reclassify existing 2 GHz fixed microwave users as secondary after the transition period would be eliminated.

Respectfully submitted,

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A handwritten signature in dark ink, appearing to read "R. J. Miller", is written over a horizontal line.

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GW03/132933

CERTIFICATE OF SERVICE

I, Mary Grayson, a secretary in the law offices of Gardere & Wynne, L.L.P., do hereby certify that copies of the foregoing Reply Comments will be served by first class mail, postage paid, on the following parties on the 8th day of January, 1993:

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